

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
)	
v.)	
)	
JOHN C. KIRIAKOU,)	No. 1:12cr127-LMB
)	(Hon. Leonie M. Brinkema)
)	
Defendant.)	
)	

NOTICE OF MOTION OF JULIE TATE TO QUASH SUBPOENA

Julie Tate, through undersigned counsel, hereby gives notice that she will respectfully move this Court before the Honorable Leonie M. Brinkema, in the United States District Court for the Eastern District of Virginia on October 18, 2012 at 1:00 p.m. as part of the hearing that has been previously set by the Court for consideration of this motion, or at a time and place to be set by the Court, for an order quashing the subpoena directed to her.

As set forth at greater length in the supporting memorandum and declaration of Ms. Tate, the subpoena should be quashed because the testimony that defendant seeks is protected by the reporter's privilege arising under the First Amendment of the United States Constitution and under federal common law, and defendant has failed to meet his burden to overcome that privilege.

WILLIAMS & CONNOLLY LLP

Attorneys for Julie Tate

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of October 2012, I served the foregoing filing on the following via e-mail via the ECF system:

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